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From: ABeggs@foley.com
Sent: Fri 10/27/2017 3:58:43 PM
Subject: Container Life Cycle Management

Erik,

I am resending this message to the broader group as I understand that you are out of the office today. I am writing in follow up to my voicemail from yesterday regarding the Container Life Cycle Management LLC (CLCM) emission sampling report due to EPA today related to the St. Francis Facility.

As part of the preparation of the report, CLCM took photos during the sampling that occurred at the Facility in order to document the contents of each individual drum. The photos consist almost entirely of drums that went through the line during the sampling and each of those photos appear to contain labels which in turn include corporate and/or vendor names and related identifying information.

Because the identify of CLCM's corporate and/or vendor names within the labels are valuable confidential business information and highly confidential, we propose to redact the labels on the drums within the photos that CLCM will be submitting with the report. Disclosure of corporate and/or vendors names would be valuable to competitors and others, and would have a severe economic impact on CLCM.

CLCM will also be submitting a log that reflects the chemical content of each of the drums that went through the line during the sampling, so this will provide EPA with the information from the labels on the drums without providing the corporate and/or vendors names which are confidential business information.

Please let us know if EPA will agree to this approach.

Thanks very much,

Amanda

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